

provides sufficient support to satisfy the statutory standards that rates are "just, reasonable and affordable," that rural customers will have access to advanced and information services and that rates and services in rural and urban areas are "reasonably comparable";

4. Reject the recommendation to terminate support for additional residential and multiline business connections, in recognition that the traditional tacit assumption that "per line" cost, support or revenue measurements are cost-based is incorrect, since most of the cost is incurred for the first line;

5. Allow for investments after 1995 by permitting adjustments to frozen transitional support and allowing for a healthy investment growth suited to an advancing, globally competitive telecommunications infrastructure;

6. Permit RLECs to disaggregate interim support by zones, density or factors modeled on proxy disaggregation, to prevent windfall support for their competitors who use their lines for below cost prices; and

7. Refrain from wasting time and resources in pursuing competitive bidding proposals that will not pass muster under the law.

Respectfully submitted,

TDS TELECOMMUNICATIONS CORPORATION

and

CENTURY TELEPHONE ENTERPRISES, INC.

By /s/ Margot Smiley Humphrey

Margot Smiley Humphrey

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December 19, 1996

CERTIFICATE OF SERVICE

I, Weldrena Jones-Bean hereby certify that a true and correct copy of the foregoing "Comments of TDS Telecom and Century Telephone Enterprises, Inc. was served by U.S. First Class Mail, postage prepaid, this date on the following:

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